

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3068

CONTINUED



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2016 JUN 14 AM 9:19

June 14, 2016

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *culthor*  
Staff Director

FROM: Patricia C. Orrock *PO/nme*  
Chief Compliance Officer

Debbie Chacona *DC/nme*  
Assistant Staff Director  
Reports Analysis Division

BY: *KDR*  
Kristin D. Roser/Ben Holly *B.H.*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation -2016  
April Quarterly Report for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2016 April Quarterly Report in accordance with 52 U.S.C. § 30104(a). The April Quarterly Report was due on April 15, 2016.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a

**2. Send the appropriate letters.**

**2. Send the appropriate letters.**

Federal Election Commission  
Reason to Believe Circulation Report  
2016 APRIL QUARTERLY Not Election Sensitive 04/15/2016 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3056	C00172833	AMERICAN ASSOCIATION OF CROP INSURERS POLITICAL ACTION COMMITTEE (AACI PAC)		MICHAEL R. MCLEOD	\$284,987	0	4/21/2016	6	\$44,519	\$320
3057	C00572537	AMERICANS SOCIALLY UNITED		CARY L. PETERSON	\$233,949	0		Not Filed	\$233,949 (est)	\$7,150
3058	C00579664	CITIZENS FOR XAVIER SALINAS	XAVIER SALINAS	RAY PEREZ	\$127,950	0		Not Filed	\$63,975 (est)	\$2,970
3059	C00554253	CLAITOR FOR CONGRESS	DANIEL A. CLAITOR	CHELSEA BONNECAZE	\$120,518	3		Not Filed	\$120,518 (est)	\$8,662
3060	C00580563	COLLIN COUNTY REPUBLICAN PARTY		JONATHAN COCKS	\$185,880	0	4/26/2016	11	\$178,680	\$2,630
3061	C00480228	CONTINUING AMERICA'S STRENGTH AND SECURITY PAC		RALPH J. STEPHENS	\$671,292	0	5/5/2016	20	\$161,275	\$3,980
3062	C00555862	FOUNDATION FOR A GREATER AMERICA INC		JAMES P. HODGINS	\$725,746	1		Not Filed	\$725,746 (est)	\$14,437
3063	C00524363	GREAT LAKES SUPER POLITICAL ACTION COMMITTEE		DWIGHT WASHINGTON	\$157,500	0		Not Filed	\$78,750 (est)	\$3,850
3064	C00589846	GREG GARRETT FOR CONGRESS	GREGORY KEITH GARRETT	GARY LINKER	\$168,631	0	4/25/2016	10	\$30,808	\$400
3065	C00578518	INGRID TURNER FOR CONGRESS	INGRID TURNER	LATRISIE MARIE WORKMAN	\$606,057	0	6/7/2016	Not Filed	\$121,353	\$4,950
3066	C00402982	IRL PAC		ED TORGAS	\$113,230	0	5/4/2016	19	\$66,334	\$2,087

3068	C00580373	MAKE AMERICA GREAT AGAIN		LESLIE CALDWELL	\$3,327,653	0		Not Filed	\$3,327,653 (est)	\$13,200
3069	C00493395	MARK GREENBERG FOR CONGRESS	MARK GREENBERG	J. KENNETH NOWELL	\$199,671	0	4/22/2016	7	\$26,565	\$340
3070	C00139964	NATIONAL ASSOCIATION OF WHEAT GROWERS POLITICAL ACTION COMMITTEE (WHEATPAC)		JIM PALMER	\$148,972	0	5/17/2016	Not Filed	\$100,456	\$4,950
3071	C00405555	NATIONAL COUNCIL OF TEXTILE ORGANIZATIONS INC POLITICAL ACTION COMMITTEE		ROBIN L. HAYNES	\$327,413	0	5/1/2016	16	\$90,979	\$2,200
3072	C00592303	OREGON RIGHT TO LIFE VICTORY PAC		GAYLE ATTEBERRY	\$416,707	0	5/5/2016	20	\$92,899	\$2,640

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3073	C00238204	PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC		PARVEZ SHAH	\$163,122	0	5/15/2016	30	\$34,931	\$800
3074	C00591628	SIMON WINSTON FOR CONGRESS	SIMON WOOD WINSTON	MAUREEN HAFFERNIK	\$798,665	0	5/11/2016	26	\$413,168	\$7,200
3075	C00560649	TOM CARTER FOR CONGRESS	THOMAS G. CARTER	THOMAS CARTER	\$137,286	0		Not Filed	\$137,286 (est)	\$4,950
3076	C00573428	WHITWELL FOR CONGRESS	ROBERT QUENTIN WHITWELL JR.	OFFICE OF TREASURER	\$437,531	1		Not Filed	\$72,922 (est)	\$3,712

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation - 2016	)	
April Quarterly Report for the	)	
Administrative Fine Program:	)	
AMERICAN ASSOCIATION OF CROP	)	AF# 3056
INSURERS POLITICAL ACTION	)	
COMMITTEE (AACI PAC), and	)	
MCLEOD, MICHAEL R. as treasurer;	)	
AMERICANS SOCIALLY UNITED, and	)	AF# 3057
PETERSON, CARY L as treasurer;	)	
CITIZENS FOR XAVIER SALINAS, and	)	AF# 3058
PEREZ, RAY as treasurer;	)	
CLAITOR FOR CONGRESS, and	)	AF# 3059
CHELSEA BONNECAZE as treasurer;	)	
COLLIN COUNTY REPUBLICAN	)	AF# 3060
PARTY, and COCKS, JONATHAN as	)	
treasurer;	)	
CONTINUING AMERICA'S STRENGTH	)	AF# 3061
AND SECURITY PAC, and STEPHENS,	)	
RALPH J. as treasurer;	)	
FOUNDATION FOR A GREATER	)	AF# 3062
AMERICA INC, and HODGINS, JAMES P	)	
MR. as treasurer;	)	
GREAT LAKES SUPER POLITICAL	)	AF# 3063
ACTION COMMITTEE, and DWIGHT	)	
WASHINGTON as treasurer;	)	
GREG GARRETT FOR CONGRESS, and	)	AF# 3064
LINKER, GARY as treasurer;	)	
INGRID TURNER FOR CONGRESS, and	)	AF# 3065
LATRISSE MARIE WORKMAN as	)	
treasurer;	)	
IRL PAC, and TORGAS, IRL PAC	)	AF# 3066
TREASURER. ED as treasurer;	)	
	)	
MAKE AMERICA GREAT AGAIN, and	)	AF# 3068
LESLIE CALDWELL as treasurer;	)	
MARK GREENBERG FOR CONGRESS,	)	AF# 3069
and NOWELL, J. KENNETH as treasurer;	)	

NATIONAL ASSOCIATION OF WHEAT ) AF# 3070  
GROWERS POLITICAL ACTION )  
COMMITTEE (WHEATPAC), and )  
PALMER, JIM as treasurer; )  
NATIONAL COUNCIL OF TEXTILE ) AF# 3071  
ORGANIZATIONS INC POLITICAL )  
ACTION COMMITTEE, and HAYNES, )  
ROBIN L as treasurer; )  
OREGON RIGHT TO LIFE VICTORY ) AF# 3072  
PAC, and ATTEBERRY, GAYLE as )  
treasurer; )  
PAKISTANI AMERICAN PUBLIC ) AF# 3073  
AFFAIRS COMMITTEE PAK-PAC, and )  
SHAH, PARVEZ DR. as treasurer; )  
SIMON WINSTON FOR CONGRESS, and ) AF# 3074  
HAFFERNIK, MAUREEN as treasurer; )  
TOM CARTER FOR CONGRESS, and ) AF# 3075  
CARTER, THOMAS as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on June 15, 2016 the Commission took the  
following actions on the Reason To Believe Recommendation - 2016 April Quarterly  
Report for the Administrative Fine Program as recommended in the Reports Analysis  
Division's Memorandum dated June 14, 2016, on the following committees:

AF#3056 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN  
ASSOCIATION OF CROP INSURERS POLITICAL ACTION COMMITTEE (AACI  
PAC), and MCLEOD, MICHAEL R. in his official capacity as treasurer violated 52  
U.S.C. 30104(a) and make a preliminary determination that the civil money penalty  
would be the amount indicated on the report; (2) send the appropriate letter.  
Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted  
affirmatively for the decision.

AF#3057 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICANS SOCIALLY UNITED, and PETERSON, CARY L in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3058 Decided by a vote of 6-0 to: (1) find reason to believe that CITIZENS FOR XAVIER SALINAS, and PEREZ, RAY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3059 Decided by a vote of 6-0 to: (1) find reason to believe that CLAITOR FOR CONGRESS, and CHELSEA BONNECAZE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3060 Decided by a vote of 6-0 to: (1) find reason to believe that COLLIN COUNTY REPUBLICAN PARTY, and COCKS, JONATHAN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3061 Decided by a vote of 6-0 to: (1) find reason to believe that CONTINUING AMERICA'S STRENGTH AND SECURITY PAC, and STEPHENS, RALPH J. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3062 Decided by a vote of 6-0 to: (1) find reason to believe that FOUNDATION FOR A GREATER AMERICA INC, and HODGINS, JAMES P MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.



AF#3063 Decided by a vote of 6-0 to: (1) find reason to believe that GREAT LAKES SUPER POLITICAL ACTION COMMITTEE, and DWIGHT WASHINGTON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3064 Decided by a vote of 6-0 to: (1) find reason to believe that GREG GARRETT FOR CONGRESS, and LINKER, GARY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3065 Decided by a vote of 6-0 to: (1) find reason to believe that INGRID TURNER FOR CONGRESS, and LATRISE MARIE WORKMAN in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3066 Decided by a vote of 6-0 to: (1) find reason to believe that IRL PAC, and TORGAS, IRL PAC TREASURER, ED in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3068 Decided by a vote of 6-0 to: (1) find reason to believe that MAKE AMERICA GREAT AGAIN, and LESLIE CALDWELL in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3069 Decided by a vote of 6-0 to: (1) find reason to believe that MARK GREENBERG FOR CONGRESS, and NOWELL, J. KENNETH in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3070 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ASSOCIATION OF WHEAT GROWERS POLITICAL ACTION COMMITTEE (WHEATPAC), and PALMER, JIM in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3071 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL COUNCIL OF TEXTILE ORGANIZATIONS INC POLITICAL ACTION COMMITTEE, and HAYNES, ROBIN L in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3072 Decided by a vote of 6-0 to: (1) find reason to believe that OREGON RIGHT TO LIFE VICTORY PAC, and ALTEBERRY, GAYLE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3073 Decided by a vote of 6-0 to: (1) find reason to believe that PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC, and SHAH, PARVEZ DR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3074 Decided by a vote of 6-0 to: (1) find reason to believe that SIMON WINSTON FOR CONGRESS, and HAFERNIK, MAUREEN in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.


**Federal Election Commission  
Certification for Administrative Fines  
June 15, 2016**

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**AF#3075** Decided by a vote of 6-0 to: (1) find reason to believe that TOM CARTER FOR CONGRESS, and CARTER, THOMAS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

**Attest:**

June 17, 2016  
Date

  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 16, 2016

Leslie Caldwell, in official capacity as Treasurer  
Make America Great Again  
208 East 51st Street, Suite 157  
New York, NY 10022

C00580373  
AF#: 3068

Dear Ms. Caldwell:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period January 1, 2016 through March 31, 2016, shall be filed no later than April 15, 2016. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On June 15, 2016, the FEC found that there is reason to believe ("RTB") that Make America Great Again and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before April 15, 2016. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$13,200. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$13,200 is due within forty (40) days of the finding, or by July 25, 2016, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$3,327,653  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street,

NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or July 25, 2016. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Make America Great Again and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.


**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Matthew S. Petersen  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$13,200 for the 2016 April Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Make America Great Again

FEC ID#: C00580373

AF#: 3068

PAYMENT DUE DATE: July 25, 2016

PAYMENT AMOUNT DUE: \$13,200



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2016 NOV -7 AM 9:42

November 7, 2016

**SENSITIVE**

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *KDR*  
Kristin D. Roser/Ben Holly *BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Final Determination Recommendation -  
2016 April Quarterly Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on November 1, 2016 in order to correct errors in the final money penalty and amount paid columns of the circulation chart for AF 3058 and AF 3068. The correct amounts were previously referenced in the cover memo.

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2016 April Quarterly Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.



In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, five (5) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Citizens for Xavier Salinas (AF 3058) filed the 2016 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$35,363 (previously estimated to be \$63,975), thus the fine would be lowered from \$2,970 to \$1,090. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$1,880).

Great Lakes Super Political Action Committee (AF 3063) filed the 2016 April Quarterly Report after the RTB finding and disclosed no activity (previously estimated to be \$78,750), which would result in no civil money penalty (fine previously assessed to be \$3,850).

Make America Great Again (AF 3068) filed the 2016 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$3,526 (previously estimated to be \$3,327,653), thus the fine would be lowered from \$13,200 to \$275. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$12,925).

Tom Carter for Congress (AF 3075) disclosed no activity after the RTB finding (previously estimated to be \$137,286), which would result in no civil money penalty (fine previously assessed to be \$4,950).

Whitwell for Congress (AF 3076) disclosed no activity after the RTB finding (previously estimated to be \$72,922), which would result in no civil money penalty (fine previously assessed to be \$3,712).

In addition, Collin County Republican Party (AF 3060) made only a partial payment of the civil money penalty assessed at the RTB stage. As such, the civil money penalty is listed as not paid.

- Pakistani American Public Affairs Committee PAK-PAC (AF 3073) filed an Amended Statement of Organization after the RTB finding designating Jalil Khan as Treasurer (see first list).
- Collin County Republican Party (AF 3060) filed an Amended Statement of Organization after the RTB finding designating Mark Reid as Treasurer (see second list).

**THE UNIVERSITY OF CHICAGO**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.**
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.**
- (3) Send the appropriate letters.**

**Federal Election Commission  
FD Circulation Report Fine Paid**

• This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

**Federal Election Commission**  
**FD Circulation Report Fine Not Paid**  
**2016 APRIL QUARTERLY Not Election Sensitive 04/15/2016 H\_S\_P\_UNAUTH**

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3057	AMERICANS SOCIALLY UNITED		C00572537	CARY L. PETERSON		Not Filed	\$233,948 (est)	0	6/15/2016	\$7,150	145	\$7,150
3059	CLAITOR FOR CONGRESS	DANIEL A. CLAITOR	C00554253	CHELSEA BONNECAZE		Not Filed	\$120,518 (est)	3	6/15/2016	\$8,662	145	\$8,662
3060	COLLIN COUNTY REPUBLICAN PARTY		C00580563	MARK REID	4/26/2016	11	\$178,680	0	6/15/2016	\$2,630	145	\$2,630
3063	GREAT LAKES SUPER POLITICAL ACTION COMMITTEE		C00524363	DWIGHT WASHINGTON	7/11/2016	Not Filed	\$0	0	6/15/2016	\$3,850	145	NONE
3065	INGRID TURNER FOR CONGRESS	INGRID TURNER	C00578518	LATRICE MARIE WORKMAN	6/7/2016	Not Filed	\$121,408	0	6/15/2016	\$4,950	145	\$4,950
3075	TOM CARTER FOR CONGRESS	THOMAS G. CARTER	C00560849	THOMAS CARTER		Not Filed	\$0	0	6/15/2016	\$4,950	145	NONE
3076	WHITWELL FOR CONGRESS	ROBERT QUENTIN WHITWELL JR.	C00573428	OFFICE OF TREASURER		Not Filed	\$0	1	6/15/2016	\$3,712	145	NONE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program – Final )  
Determination Recommendation for the )  
2016 April Quarterly Report: )  
COLLIN COUNTY REPUBLICAN ) AF# 3060  
PARTY, and REID, MARK MR. as )  
treasurer; )  
INGRID TURNER FOR CONGRESS, and ) AF# 3065  
LATRISE MARIE WORKMAN as )  
treasurer; )  
CITIZENS FOR XAVIER SALINAS, and ) AF# 3058  
PEREZ, RAY as treasurer; )  
PAKISTANI AMERICAN PUBLIC ) AF# 3073  
AFFAIRS COMMITTEE PAK-PAC, and )  
KHAN, JALIL A DR. as treasurer; )  
AMERICANS SOCIALLY UNITED, and ) AF# 3057  
PETERSON, CARY L as treasurer; )  
CLAITOR FOR CONGRESS, and ) AF# 3059  
CHELSEA BONNECAZE as treasurer; )  
GREG GARRETT FOR CONGRESS, and ) AF# 3064  
LINKER, GARY as treasurer; )  
OREGON RIGHT TO LIFE VICTORY ) AF# 3072  
PAC, and ATTEBERRY, GAYLE as )  
treasurer; )  
CONTINUING AMERICA'S STRENGTH ) AF# 3061  
AND SECURITY PAC, and STEPHENS, )  
RALPH J. as treasurer; )  
MAKE AMERICA GREAT AGAIN, and ) AF# 3068  
LESLIE CALDWELL as treasurer; )  
AMERICAN ASSOCIATION OF CROP ) AF# 3056  
INSURERS POLITICAL ACTION )  
COMMITTEE (AACI PAC), and )  
MCLEOD, MICHAEL R. as treasurer; )  
MARK GREENBERG FOR CONGRESS, ) AF# 3069  
and NOWELL, J. KENNETH as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on November 09, 2016 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2016 April Quarterly Report as recommended in the Reports Analysis Division's Memorandum dated November 07, 2016, on the following committees:

AF#3060 Decided by a vote of 6-0 to: (1) make a final determination that COLLIN COUNTY REPUBLICAN PARTY, and REID, MARK MR. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3065 Decided by a vote of 6-0 to: (1) make a final determination that INGRID TURNER FOR CONGRESS, and LATRISE MARIE WORKMAN in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3058 Decided by a vote of 6-0 to: (1) make a final determination that CITIZENS FOR XAVIER SALINAS, and PEREZ, RAY in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3073 Decided by a vote of 6-0 to: (1) make a final determination that PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC, and KHAN, JALIL A DR. in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3057 Decided by a vote of 6-0 to: (1) make a final determination that AMERICANS SOCIALLY UNITED, and PETERSON, CARY L in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so

indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3059 Decided by a vote of 6-0 to: (1) make a final determination that CLAITOR FOR CONGRESS, and CHELSEA BONNECAZE in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3064 Decided by a vote of 6-0 to: (1) make a final determination that GREG GARRETT FOR CONGRESS, and LINKER, GARY in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3072 Decided by a vote of 6-0 to: (1) make a final determination that OREGON RIGHT TO LIFE VICTORY PAC, and ATTEBERRY, GAYLE in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3061 Decided by a vote of 6-0 to: (1) make a final determination that CONTINUING AMERICA'S STRENGTH AND SECURITY PAC, and STEPHENS, RALPH J. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3068 Decided by a vote of 6-0 to: (1) make a final determination that MAKE AMERICA GREAT AGAIN, and LESLIE CALDWELL in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3056 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN ASSOCIATION OF CROP INSURERS POLITICAL ACTION COMMITTEE (AACI PAC), and MCLEOD, MICHAEL R. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3069 Decided by a vote of 6-0 to: (1) make a final determination that MARK GREENBERG FOR CONGRESS, and NOWELL, J. KENNETH in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so

Federal Election Commission  
Certification for Administrative Fines  
November 09, 2016

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indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

November 9, 2016  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 9, 2016

Leslie Caldwell, in official capacity as Treasurer  
Make America Great Again  
208 East 51st Street, Suite 157  
New York, NY 10022

C00580373  
AF#: 3068

Dear Ms. Caldwell:

On June 15, 2016, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Make America Great Again and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2016 April Quarterly Report. By letter dated June 17, 2016, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be \$13,200 in accordance with the schedule of penalties at 11 CFR § 111.43.

On July 22, 2016, the FEC received payment of the civil money penalty calculated at the RTB stage. Since that time, the amount of the civil money penalty has been changed to reflect the level of activity of the Amended 2016 April Quarterly Report. The FEC made a final determination on November 9, 2016 that Make America Great Again and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$275 in accordance with 11 CFR § 111.43, and voted to close the file. Please note, the Commission will be issuing a refund of \$12,925.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Ben Holly on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Matthew S. Petersen", is written over a horizontal line.

Matthew S. Petersen  
Chair



THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3068